

# **Exhibit C**

**Perkins, Fred**

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**From:** Avram Frisch <frischa@avifrischlaw.com>  
**Sent:** Friday, June 27, 2025 3:26 PM  
**To:** Perkins, Fred  
**Cc:** Wing K. Chiu (wkc@lawmlg.com)  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

**CAUTION:** External sender. Verify before continuing.

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Fred,

My client has not answered the questions you raised about the source code. I need to meet with Dr. Malaga about some of the issues you asked as well. It is possible that there is another version of the source code and I will review and get back to you on that.

Operational software should be available, we have been working on it, but it has to be created for you. It is not something they already had available.

Documents are still in process. My client needs to finish paying the vendor, which he made a substantial payment but has not completed and then I need to be given access by the vendor. I am hopeful that we will be closer to a resolution next week. I understand that you like your questions answered immediately, but I do not have them yet.

Avi



THE LAW OFFICE OF  
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**From:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Sent:** Wednesday, June 25, 2025 6:26 PM  
**To:** Avram Frisch <frischa@avifrischlaw.com>  
**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

Can you clarify what you mean about the "waiting for the client to answer about your source code question." In item no 2 below, I raised 3 separate questions regarding source code: (i) confirmation of dates of the source code you produced, (ii) whether Dumbo has any earlier version of source code to produce, and (iii) corrected information about the 46 files/directories that were misidentified in Dumbo's First Amended Responses to Defendants' second set of interrogatories. Is Dumbo going to provide answers to all three questions and if so when?

Similarly, you have been saying the operational software will be ready to be exchanged soon, can you provide a date certain for such exchange?

Best regards,

Fred



**Fred H. Perkins**

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**From:** Avram Frisch <frischa@avifrischlaw.com>

**Sent:** Wednesday, June 25, 2025 6:14 PM

**To:** Perkins, Fred <fhperkins@morrisoncohen.com>

**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>

**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

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The operational software should be ready soon.

I am still waiting for the client to answer about your source code question. I inquired about the documents and still waiting for them to be fully paid which apparently hasn't happened yet.

Avi Frisch

The Law Office of Avram E. Frisch LLC

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**From:** Perkins, Fred <fhperkins@morrisoncohen.com>

**Sent:** Wednesday, June 25, 2025 5:40:06 PM

**To:** Avram Frisch <frischa@avifrischlaw.com>

**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>

**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,